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Attorneys for Defendant Corizon Health, Inc.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

DEREK JOHNSON, personal representative
of KELLY CONRAD GREEN II, deceased;
KELLY CONRAD GREEN and SANDY
PULVER,

Plaintiffs,

vs.

CORIZON HEALTH, INC., a Tennessee
corporation; LANE COUNTY, an Oregon
county; DR. JUSTIN MONTOYA, an
individual; VICKI THOMAS, an individual;
KIRSTIN WHITE, an individual; and
SHARON EPPERSON, (née FAGAN), an
individual,

Defendants.

Case No. 6:13-cv-01855-TC

**CORIZON DEFENDANTS' WITNESS
LIST**

Defendants Corizon Health, Inc. ("Corizon"), Dr. Justin Montoya, Vicki Thomas, Kirstin White, and Sharon Epperson ("Corizon defendants"), by and through their attorneys of record, Stewart Sokol & Larkin LLC and Schwabe, Williamson & Wyatt, P.C., hereby submit the following witness list:

DEFENDANTS

1. Kirstin White - Ms. White will describe her role within Corizon at Lane County and her treatment and observations of Mr. Kelly C. Green, II on the day of February 12, 2013.

2. Justin Montoya, M.D. - Dr. Montoya will describe his role within Corizon at Lane County and his role in the events of February 12, 2013. He will also describe some of Corizon's relevant policies.

3. Vicki Thomas - Ms. Thomas will describe her role within Corizon at Lane County and her interactions with and observations of Mr. Kelly C. Green, II on the day of February 12, 2013. She will also describe some of Corizon's relevant policies.

4. Sharon Epperson - Ms. Epperson will describe her role within Corizon at Lane County and her interactions with and observations of Mr. Kelly C. Green, II on the day of February 12, 2013.

PLAINTIFFS AND/OR RELATED PARTIES

5. Kelly Green Sr. - Mr. Kelly Green Sr. will testify about the deceased's relationship with his family and his mental and physical health prior to the events of February 12, 2013.

6. Sandra Pulver - Ms. Pulver will testify about the deceased's relationship with his family and his mental and physical health prior to the events of February 12, 2013.

7. Tom Green - Mr. Tom Green will testify about the deceased's relationship with his family and his mental and physical health prior to the events of February 12, 2013.

8. Mackenzie Green - Ms. Green will testify about the deceased's relationship with his family and his mental and physical health prior to the events of February 12, 2013.

EXPERT WITNESSES

9. Chris Esguerra, M.D. - Dr. Esguerra will testify about the contents of his expert and rebuttal expert reports.

10. Joseph Penn, M.D. - Dr. Penn will testify about the contents of his expert and rebuttal expert reports.

11. Samuel "Skip" Freedman, M.D. - Dr. Freedman will testify about the contents of his expert and rebuttal expert reports.

12. Kathy Wild - Ms. Wild will testify about the contents of her rebuttal expert report.

13. Andrew Kaufmann, M.D. - Dr. Kaufmann will testify about the contents of his rebuttal expert report.

NON-PARTY FACT WITNESSES

14. Larry Brown - Lieutenant Brown will testify about the contractual and working relationship between Corizon and Lane County.

15. Keri Nelson - Ms. Nelson will testify about her observations and interactions with Mr. Green on the evening of February 11, 2013.

16. James Ball - Sergeant Ball will testify about his observations and interactions with Mr. Green on the evening of February 11, 2013.

17. Guy Balcom - Sergeant Balcom will testify about his observations and interactions with Mr. Green on February 12, 2013.

18. Angela Dodds - Deputy Dodds will testify about his observations and interactions with Mr. Green on February 12, 2013.

19. Robert Dotson - Deputy Dotson will testify about his observations and interactions with Mr. Green on February 12, 2013.

20. Richard Peters - Deputy Peters will testify about his observations and interactions with Mr. Green on February 12, 2013.

21. Mark Begimes - Mr. Begimes will testify about his observations and interactions with Mr. Green on February 12, 2013.

22. Angela Easom - Ms. Easom, current HSA for Corizon at Lane County Jail, will testify about relevant past and present practices at Lane County Jail.

23. Tonya Mooningham - In the event that the Sentinel Event Report is admitted, Ms. Mooningham will testify about her role in completing that review.

24. Gail Fore - Ms. Fore will describe her role within Corizon and her knowledge of the events of February 12, 2013.

25. Linda Panzer - Ms. Panzer, the current Administrative Assistant for Corizon at Lane County Jail, will describe her knowledge of practices and procedures at Lane County Jail.

26. Harold Orr, M.D. - Dr. Orr will discuss Corizon's corporate practices and policies and their relation to the events of February 12, 2013.

27. Jacob Pleich - Mr. Pleich will testify about his interactions with Mr. Green. Mr. Pleich will describe his role within Corizon at Lane County and his role in the events of February 12, 2013.

28. Leah Smith - Ms. Smith will describe her role within Corizon at Lane County and her interactions with and observations of Mr. Kelly C. Green, II on the day of February 12, 2013.

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29. Jona Bourgard - Ms. Bourgard will describe her role within Corizon at Lane County and her interactions with and observations of Mr. Kelly C. Green, II on the day of February 12, 2013.

30. Ivor Garlick, M.D. - Dr. Garlick will discuss relevant practices and procedures at Corizon's Lane County operation.

31. Deborah Fye - VP Regional Director, Operation, will testify about practices, policies and procedures of Corizon.

32. Roland Maldonado - COO West Region, will discuss practices, policies and procedures of Corizon.

Dated this 18th day of May, 2015.

Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

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Trial Attorney: Richard K. Hansen

Of Attorneys for Defendants, Corizon
Health, Inc., Dr. Justin Montoya, Vicki
Thomas, Kirstin White, Sharon Epperson
(née Fagan)

CERTIFICATE OF SERVICE

The undersigned declares under penalty of perjury, under the laws of the State of Oregon, that the following is true and correct:

That on the 18th day of May, 2015, I arranged for service of the foregoing CORIZON DEFENDANTS' WITNESS LIST to the parties to this action as follows:

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by:

<input type="checkbox"/>	U.S. Postal Service, ordinary first class mail
<input type="checkbox"/>	U.S. Postal Service, certified or registered mail,
<input type="checkbox"/>	return receipt requested
<input type="checkbox"/>	hand delivery
<input type="checkbox"/>	facsimile
<input checked="" type="checkbox"/>	electronic service: CM/ECF
<input type="checkbox"/>	other (specify) _____

/s/Richard K. Hansen
Richard K. Hansen